

LOS ANGELES POLICE DEPARTMENT

WILLIE L. WILLIAMS
Chief of Police

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RICHARD J. RIORDAN
Mayor

P.O. Box 30158
Los Angeles, Calif. 90030
Telephone:
(213) 847-3836
Ref #: 1.3.5

October 9, 1996

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Subject: CC Docket No. 92-105

Dear Sirs:

The Los Angeles Police Department (LAPD) would like to take this opportunity to inform the Federal Communications Commission of the Department's view regarding the proposed creation of the universal, "Non-Emergency" telephone number, 311. The LAPD supports the universal, Non-Emergency number concept; however, there are several issues that will require careful review before nationwide implementation.

As you are aware, the LAPD manages the 911 Public Safety Answer Point (PSAP) for police, fire and medical emergency for the City of Los Angeles. This PSAP handles approximately 5.5 million calls for service per year. The majority of these calls are received at the City's Center Dispatch Center (CDC) through 911. Almost 85% of these calls are of a non-emergency nature and are routed through the CDC system to a secondary bank of non-emergency operators for disposition. We have long recognized the need to reduce the number of "non-emergency" calls received by the 911 network. This unwarranted use of 911 operators precludes their being available for dealing with **true** emergencies.

To address these concerns, the City and the LAPD have been exploring various avenues for directing non-emergency calls to non-emergency numbers. One of the proposals has been to establish a universal, non-emergency "seven" digit number within the City of Los Angeles. Such a number was/is visualized as a vehicle for reporting minor incidents or requests for service of a non-emergency nature. It has been a challenge trying to isolate a number which is easy to remember and is available in all of the area codes which serve the City. Today, the City is

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served with three area codes. By the year 1997, two more area codes will be added. For this reason, a nationally-mandated number, such as 311 would be supported.

However, there are some concerns which have become apparent to the City in pursuing the "universal" aspect of this effort. These should be addressed prior to implementing this capability. These concerns fall into three major areas:

General Technical Issues

1. The new 311/N11 universal non-emergency number should be supported by the same network selective routing system as E911/911 to ensure that non-emergency calls are routed to the appropriate agency.
2. There should not be any form of overflow of non-emergency calls between agencies.
3. These 311/N11 calls should be supported with full ANI/ALI caller information, provided through the existing database platform.
4. As with 911 calls, in the future network, 311/N11 non-emergency calls should be routed using SS7 signaling but carried over the Public Switched Telephone Network rather than on dedicated trunking.
5. An important enhancement to 311/N11 vs. 911 call processing would be the ability to network switch calls from 311/N11 to 911 and back. This would optimize dedicated 911 trunking.

Education

The implementation of a universal, nationwide 311 number will require an extensive, professionally presented and well funded educational program.

Funding

The effective processing of non-emergency calls is critical to ensuring an effective 911 response. This is particularly evident in larger metropolitan areas. This mandates that adequate funding support by federal and/or state sources be established prior to the implementation of a universal, non-emergency telephone number.

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The City supports this effort and is prepared to participate in a proactive manner in the establishment of the policies, procedures, and guidelines which will be necessary to bring this to fruition. If you have any questions or we can provide any assistance, please contact Director of Systems Linda Bunker at 213-485-4452.

Very truly Yours,

WILLIE L. WILLIAMS
Chief of Police

A handwritten signature in cursive script, appearing to read "Carlo Cudio".

CARLO CUDIO, Commander
Commanding Officer
Communications Group